

ORIGINAL

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

RECEIVED

APR 17 1996

FEDERAL

In the Matter of )

Telecommunications Services )  
Inside Wiring )

Customer Premises Equipment )

CS Docket No. 95-184

DOCKET FILE COPY ORIGINAL

**REPLY COMMENTS**

MCI Telecommunications Corporation and MCImetro (MCI) hereby reply to the initial comments filed in the above-captioned proceeding. MCI supports the adoption of rules to facilitate access by competitors to end user customers of telephony and video services. As some comments demonstrate, without such rules, end user customers will not realize the benefits of robust competition in communications markets, as promised by the Telecommunications Act of 1996.

**Demarcation Point**

MCI agrees with those who support the implementation of rules to establish a uniform demarcation point for telephone and cable services so that competitors acquire easy and equal access to the interface with the customer. For new cable and telephone installations, the common demarcation point should be at the network interface unit (NIU). A common demarcation point at the NIU will lessen consumer confusion and encourage competition by reducing connection costs, which currently are a barrier to marketplace entry. The demarcation point for existing services should be at the NIU, if it exists, or within 12 inches of the customer's premise for single

No. of Copies rec'd  
List ABCDE

017

dwelling buildings. For multiple dwelling unit (MDU) buildings, the demarcation point should be the point at which wiring is dedicated to a single customer, which often is at a communications closet. The Commission should prohibit future loop-through video installations in MDU buildings because they prevent competition and customer choice.

MCI also supports DirecTV's position that the Commission should require the sharing of available bandwidth on a single broadband wire, if it is technically feasible to do so. A service provider should be able to use available bandwidth on existing broadband inside wiring because, as inside wire, use and control should be determined by the customer. Moreover, it makes the most efficient use of communications infrastructure, and it minimizes the cost and disruption to consumers in obtaining the competitive services they desire. To address the legitimate concern that such use could create service problems for cable companies by interfering with their signals, the Commission should find that a service provider who uses the available bandwidth on an existing broadband wire must resolve, and is liable for, any problems such use causes.

### **TECHNICAL STANDARDS FOR BROADBAND CONNECTIONS**

Some parties argue that it is not necessary for the Commission to adopt technical requirements for standard connectors for broadband networks because the "F" connector has become the "de facto" industry standard. MCI, however, supports those who argue for Commission action because, without standards, and in the face of competition, providers could use proprietary hardware to create a barrier to competition. In addition, the "F" connector may not be the best choice for a standard because it is prone to failure. MCI recommends that the Commission adopt a standard which is developed in consultation with industry bodies. The standard also should be revised periodically to accommodate new technologies.

**CUSTOMER CONTROL OVER INSIDE WIRE**

MCI supports those who argue that the Commission should harmonize its rules concerning customer access to, and control of, inside wiring for telephony and broadband services, including cable and direct broadcast services. The right to access and own telephone inside wiring has benefitted consumers by providing them greater choice and lower rates. These same benefits should be provided to broadband subscribers. Thus, the Commission should adopt rules that provide for broadband subscribers to own their inside wiring after installation. Broadband installers should be able to recover their costs through installation fees.

**ACCESS TO PREMISES**

It is clear from the comments and from current experience that, if competitors do not have the ability to access premises, consumers will not be able to realize the benefits of competition. With this in mind, MCI supports the adoption of rules to facilitate the ability of competitors to access premises. Specifically, the Commission should prohibit service providers from entering exclusive contracts for MDU buildings, and the incumbent service provider should be required to provide access to competitive service providers. In addition, service providers should have to pay no more to access a building than the actual cost incurred by the building owner in providing access. The Commission also should preempt state laws that grant exclusive use of rights-of-way to incumbent service providers.

**OTHER ISSUES**

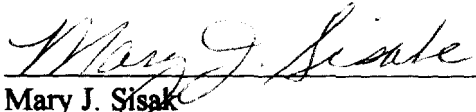
MCI supports those who argue that the Commission's current cable signal leakage rules should be applied to all service providers. This is necessary to prevent any disruption or

interference by such services. MCI also supports those who argue that consumers should be able to connect their own CPE to their cable service as long as the equipment does not create a safety hazard or degrade the service of others.

Based on the foregoing, MCI requests the Commission to adopt rules as discussed herein.

Respectfully submitted,

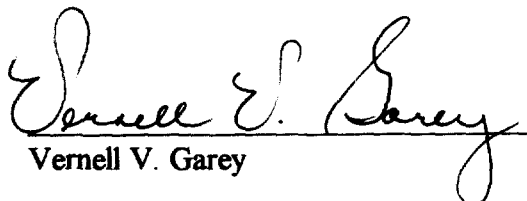
MCI TELECOMMUNICATIONS CORPORATION AND  
MCImetro

By:   
Mary J. Sisak  
Donald J. Elardo  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 887-2082  
Its Attorneys

Dated: April 17, 1996

**CERTIFICATE OF SERVICE**

I, Vernell V. Garey, do hereby certify that a true copy of the foregoing "**Reply Comments**" was served on April 17, 1996, by first class mail, postage prepaid, upon the following:

  
Vernell V. Garey

**\*HAND-DELIVERED**

International Transcriptions Service\*  
1919 M Street, N.W., Room 214  
Washington, D.C. 20554

Gary Phillips, Esq.  
Ameritech  
1401 H Street, N.W., Room 1020  
Washington, D.C. 20005

Lucille M. Mates  
Sarah Rubenstein  
Pacific Bell and Pacific Telesis  
140 New Montgomery Street  
Room 1522A  
San Francisco, CA 94105

Stephen E. Coran  
William J Andrie, jr.  
Rini, Coran & Lancellotta, P.C.  
Dupont Circle Building  
1350 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036  
Attorneys for Multimedia Development  
Corporation

Margaret E. Garber  
Pacific Bell and Pacific Telesis  
1275 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Joseph S. Paykel  
Andrew Jay Schwartzman  
Media Access Project  
2000 M Street, N.W., Suite 400  
Washington, D.C. 20036

Bruce A. Ramsey  
Kristin A. Ohlson  
Pacific Telesis Video Services  
2410 Camino Ramon, Suite 100  
San Ramon, CA 94583

Deborah C. Costlow  
Alan G. Fishel  
Winston & Strawn  
1400 L Street, N.W.  
Washington, D.C. 20005  
Attorneys for Independent Cable &  
Telecommunications Association

Michael J. Karson, Esq.  
Ameritech  
Room FH88  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60196-1025

Rhonda L. Daniels  
 Senior Counsel  
 National Association of Home Builders  
 1201 Fifteenth Street, N.W.  
 Washington, D.C. 20005-2800

William D. Baskett III  
 Thomas E. Taylor  
 David S. Bence  
 Frost & Jacobs  
 2500 PNC Center  
 201 East Fifth Street  
 Cincinnati, OH 45201-5715  
 Attorneys for Cincinnati Bell  
 Telephone Company

John F. Raposa, HQE03J27  
 GTE Service Corporation  
 P.O. Box 152092  
 Irving, TX 75015-2092

Gail L. Polivy  
 GTE  
 1850 M Street, N.W.  
 Suite 1200  
 Washington, D.C. 20036

M. Robert Sutherland  
 Theodore R. Kingsley  
 BellSouth Corporation and  
 BellSouth Telecommunications, Inc.  
 1155 Peachtree Street, N.W., Suite 1800  
 Atlanta, GA 30309-3610

Gregory L. Cannon  
 U.S. West, Inc.  
 1020 19th Street, N.W., Suite 700  
 Washington, D.C. 20036

Mark C. Rosenblum  
 Ava B. Kleinman  
 Seth S. Gross  
 AT&T Corp.  
 295 North Maple Avenue, Room 3245F3  
 Basking Ridge, NJ 07920

Peter B. Keisler  
 David L. Lawson  
 1722 Eye Street, N.W.  
 Washington, D.C. 20006  
 Attorneys for AT&T Corp.

Steven J. Cox  
 Senior Vice President  
 Business Affairs & General Counsel  
 DIRECTV, Inc.  
 2230 East Imperial Highway  
 El Segundo, CA 90245

Daniel L. Brenner  
 Loretta P. Polk  
 1724 Massachusetts Avenue, N.W.  
 Washington, D.C. 20036  
 Counsel for the National Cable Television  
 Association, Inc.

Paul J. Sinderbrand  
 Robert D. Primosch  
 Wilkinson, Barker, Knuer & Quinn  
 1735 New York Avenue, N.W.  
 Washington, D.C. 20006  
 Attorneys for Wireless Cable Association  
 International, Inc.

**Peter Arth, Jr.**  
**Edward W. O'Neill**  
**Mary Mack Adu**  
**Attorneys for the People of the State of**  
**California**  
**505 Van Ness Avenue**  
**San Francisco, CA 94102**

**Stephen R. Effros**  
**James H. Ewalt**  
**Cable Telecommunications Association**  
**3950 Chain Bridge Road**  
**P.O. Box 1005**  
**Fairfax, VA 22030-1005**

**Mary McDermott**  
**Linda Kent**  
**Charles D. Cosson**  
**United States Telephone Association**  
**1401 H Street, N.W., Suite 600**  
**Washington, D.C. 20005**

**Fiona Branton**  
**Director of Government Relations,**  
**Information Technology Industry Council**  
**1250 Eye Street, N.W., Suite 200**  
**Washington, D.C. 20005**

**James R. Hobson**  
**Donelan, Cleary, Wood & Master, P.C.**  
**1100 New York Avenue, N.W., Suite 750**  
**Washington, D.C. 20005-3934**  
**Attorneys for Building Industry Consulting**  
**Service International**

**John Gage**  
**President, BICSI**  
**10300 University Center Drive**  
**Suite 100**  
**Tampa, FL 33612**

**Nicholas P. Miller**  
**William Malone**  
**Matthew C. Ames**  
**MILLER, CANFIELD, PADDOCK AND**  
**STONE**  
**1225 Nineteenth Street, N.W., Suite 400**  
**Washington, D.C. 20036-2420**

**Michael H. Dworkin**  
**Senior Vice President and General Counsel**  
**Riser Management Systems, L.P.**  
**P.O. Box 1264 (Courier: 200 Church St.)**  
**Burlington, VT 05402**

**Randall Fisher, Esq.**  
**John Glicksman, Esq.**  
**Leslie Brown, Esq.**  
**Adelphia Communications Group**  
**5 West Third Street**  
**Coudersport, PA 16915**

**Stephen R. Effros, President**  
**James H. Watt, Exec. VP**  
**Cable Telecommunications Association**  
**PO Box 1005**  
**Fairfax, VA 22030**

**Richard L. Sharp**  
**Chairman President and CEO**  
**W. Stephen Cannon**  
**Senior Vice President and General Counsel**  
**Circuit City Stores, Inc.**  
**9950 Maryland Drive**  
**Richmond, VA 23233**

**Jeffrey A. Campbell**  
**Manager, Federal Government Affairs**  
**Compaq Computer Corporation**  
**1300 I Street, N.W.**  
**Washington, D.C. 20005**

**Howard B. Homonoff**  
**Director, Corporate and Legal Affairs**  
**Brenda Fox, Vice President**  
**Continental Cablevision**  
**Lewis Wharf, Pilot House**  
**Boston, MA 02110**

**Peter H. Feinberg**  
**Dow, Lohnes & Albertson**  
**1200 New Hampshire Avenue, N.W.**  
**Suite 800**  
**Washington, D.C. 20036**  
**Attorney for Cox Communications**

**Quincy Rogers, Vice President**  
**Government Affairs**  
**General Instrument Corporation**  
**1133 21st Street, N.W., Suite 405**  
**Washington, D.C. 20036**

**Herbert E. Marks**  
**Brian J. McHugh**  
**Squire, Sanders & Dempsey**  
**1201 Pennsylvania Avenue, N.W.**  
**P.O. Box 407**  
**Washington, D.C. 20044**  
**Attorneys for The Independent Data**  
**Communications Manufacturers Assoc.**

**Robert W. Taylor**  
**Director of Regulatory Affairs**  
**Interactive Cable Systems, Inc. & ActiveTel**  
**520 W. Arapaho**  
**Richardson, TX 75080**

**W. James MacNaughton**  
**Liberty Cable Company, Inc.**  
**90 Woodbridge Center Drive**  
**Suite 610**  
**Woodbridge, NJ 07095**

**Paul Gist**  
**Robert G. Scott, Jr.**  
**T. Scott Thompson**  
**Cole, Raywid & Braverman, L.L.P.**  
**1919 Pennsylvania Avenue, N.W.**  
**Suite 200**  
**Washington, D.C. 20006**

**Dom Prezzano**  
**Senior Vice President**  
**Metropolitan Life Insurance Company**  
**Corporate Property Management**  
**One Madison Avenue**  
**New York, NY 10010-3690**



Andrew D. Lipman  
 Mark Sievers  
 Swidler & Berlin, Chartered  
 3000 K Street, N.W., Suite 300  
 Washington, D.C. 20007  
 Attorneys for MFS Communications  
 Company., Inc.

Henry Goldberg  
 W. Kenneth Ferree  
 Goldberg, Godles, Wiener & Wright  
 1229 Nineteenth Street, N.W.  
 Washington, D.C. 20036  
 Attorneys for MultiTechnologies,  
 Optel, Inc.

Michael D. Kerr  
 Senior Vice President  
 General Manager  
 Equipment Division  
 Siecor Corporation  
 800 17th Street, N.W.  
 Hickory, C 28601-3336

John W. Pettit  
 Richard J. Arsenault  
 Drinker Biddle & Reath  
 901 Fifteenth Street, N.W.  
 Suite 900  
 Washington, D.C. 20005  
 Attorneys for Tandy Corp.

Michael H. Hammer  
 Francis M. Buono  
 Wilkie Farr & Gallagher  
 Three Lafayette Centre  
 1155 21st Street, N.W.  
 Washington, D.C. 20036  
 Attorneys for Tele-Communications, Inc.

Ronald Angner, Chair  
 TIA User Premises  
 Equipment Division  
 2500 Wilson Boulevard  
 Arlington, VA 22201

Aaron I. Fleischman  
 Fleischman and Walsh, L.L.P.  
 1400 Sixteenth Street, N.W.  
 Suite 600  
 Washington, D.C. 20554  
 Attorney for Time Warner Cable

Mark J. Palchick  
 Thomas B. Magee  
 Vorys, Sater, Seymour and Pease  
 1828 L Street, N.W., Eleventh Floor  
 Washington, D.C. 20036-5104  
 Attorneys for TKR Cable Company